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*Counsel for PSEG Nuclear, LLC, i/p/a PSEG Global, USA, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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NORTHERN DIVERS USA, INC.	:
	:
Plaintiff,	: DOCKET NO.: 1:24-cv-08279-KMW-EAP
	:
vs.	: CIVIL ACTION
	:
ATLANTIC SUBSEA, INC., AJAY A.	:
TALWAR, VINOD MENEZES, PSEG GLOBAL	: Motion Day: July 7, 2025
USA, INC., and XYLEM DEWATERING	:
SOLUTIONS, INC.	: <b>DEFENDANTS, PSEG NUCLEAR, LLC</b>
	: <b>(I/P/A PSEG GLOBAL USA, INC.),</b>
Defendants.	: <b>ATLANTIC SUBSEA, INC., AJAY A.</b>
	: <b>TALWAR, AND VINOD MENEZES’S</b>
	: <b>NOTICE OF MOTION TO DISMISS</b>
	: <b>PLAINTIFF’S FIRST AMENDED</b>
	: <b>COMPLAINT, OR IN THE</b>
	: <b>ALTERNATIVE, TO CONSOLIDATE OR</b>
	: <b>STAY OF SERVICE</b>

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**PLEASE TAKE NOTICE** that on July 7, 2025, or at another date designated by the Court, Defendants, PSEG Nuclear, LLC (I/P/A PSEG Global USA, Inc.), Atlantic Subsea, Inc., Ajay A. Talwar, and Vinod Menezes's (together, "Defendants"), through their undersigned counsel, will make application before Honorable Karen Williams, U.S.D.J., at the Mitchell H. Cohen U.S. Courthouse & Federal Building, 4<sup>th</sup> and Cooper Streets, Camden, New Jersey 08101, seeking entry of an Order granting their Motion To Dismiss Plaintiff, Northern Divers, Inc.'s First Amended Complaint, or in the Alternative, to Consolidate or Stay.

**PLEASE TAKE FURTHER NOTICE** that in support of their Motion, Defendants will rely upon the accompanying Memorandum and any further reply submissions.

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service is also being submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that Defendants are also submitting a proposed order herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is required in the event there is opposition to Defendants' Motion.

Respectfully submitted,

Dated: June 2, 2025

By: /s/ Susan A. Weir.

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**CERTIFICATE OF SERVICE**

I, Susan A. Weir, hereby certify that on June 2, 2025, the foregoing Notice of Motion to Dismiss Plaintiff's First Amended Complaint, Memorandum in Support of Motion, and Proposed Order were served upon all counsel of record through the Court's electronic filing system.

WEIR LLP

By: /s/ Susan A. Weir.

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